

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

JULIE PEREIRA,

Plaintiff,

v.

CITY OF LAKELAND, TENNESSEE,
and KATRINA SHIELDS,

Defendants.

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Case No. 2:24-cv-02380

JOINT MOTION TO APPROVE CONSENT DECREE

Come now the Parties, through counsel, and respectfully move this Court to approve their proposed order of settlement and compromise, which is attached to this motion for the Court's review as **Attachment #1**. Given its terms, judicial approval of the Parties' consent decree is necessary. *See Lexington Ins. Co. v. Ambassador Grp. LLC*, 581 F. Supp. 3d 863, 870 (W.D. Ky. 2021) (discussing district courts' discretion to enter consent decrees and to order an injunction in parallel with a private settlement); *Williams v. Vukovich*, 720 F.2d 909, 920 (6th Cir. 1983) (elaborating on considerations for district court prior to entry of consent decree). If approved, all matters in controversy in this litigation will be fully and finally resolved.

Respectfully submitted,

/s/ Daniel A. Horwitz

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July, 2024, a copy of the foregoing and all exhibits and attachments were sent via CM/ECF, USPS Mail, and/or via email, to:

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